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Attorneys for James W. Giddens,  
Trustee for the SIPA Liquidation of Lehman Brothers Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS INC.,

Debtor.

Case No. 14-cv-00535-SAS

MOORE CAPITAL MANAGEMENT, LP, on behalf  
of MOORE GLOBAL INVESTMENTS, L.P.

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

Claimant,

- against -

JAMES W. GIDDENS, as Trustee for the SIPA  
Liquidation of Lehman Brothers Inc.,

Debtor.

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the declaration of Marlena C. Frantzides dated December 1, 2014 and the exhibits thereto, the declaration of Kleber Rodriguez dated December 1, 2014 and the exhibits thereto, and upon all the papers and proceedings held herein, James W. Giddens, as trustee (the "Trustee") for the SIPA Liquidation of Lehman Brothers Inc. hereby moves for an Order pursuant to Fed. R. Civ. P. 56 granting summary judgment to the Trustee on the grounds that the Claimant has failed to raise issues of material fact warranting trial, confirming the Trustee's determinations that

Claimant's claims related to foreign currency forwards are not customer claims, dismissing Claimant's objections to those determinations, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
December 1, 2014

HUGHES HUBBARD & REED LLP

By: /s/ Michael E. Salzman  
Michael E. Salzman  
Anson B. Frelinghuysen  
Marlena C. Frantzides

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